



HON. SYLVIA O. HINDS-RADIX
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July 12, 2022

VIA ECF

Hon. Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *R.B. v. New York City Dep't of Educ.*, 22-cv-3287 (DLC)(JLC)

Dear Judge Cote:

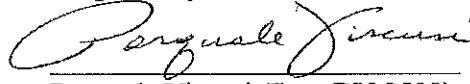
I am a Special Assistant Corporation Counsel in the office of the Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, newly assigned counsel for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs, and expenses for legal services regarding an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I am writing to respectfully request a 90-day extension of the time for Defendant to respond to the Complaint, from June 14, 2022 to September 12, 2022, and to adjourn the initial pre-trial conference currently scheduled for July 28, 2022 *sine die*. I apologize for the lateness of this request, and for any resulting inconvenience for the Court. The delay is due to an administrative oversight arising from the process of assigning many IDEA fees-only cases. Plaintiff graciously consents to these requests.

The parties hope to resolve this case without the need for conferences or motion practice and the requested extension will give the City sufficient time to complete its internal review process and begin settlement negotiations, once Plaintiff's counsel provides relevant billing records. This office has successfully settled all of the many IDEA fees-only cases brought by Plaintiff's counsel in recent years (with the exception of two cases) without burdening the Court with any motion practice, and we see no reason why this case will not follow the same course.

Thank you for considering this request.

Respectfully submitted,



Pasquale Viscusi, Esq. (PV 8588)
Special Assistant Corporation Counsel

cc: Irina Roller, Esq. (via ECF)

*The conference is adjourned to October
21, 2022 at 3³⁰ pm. There shall be
no further adjournments.*

Denise Ble
7/13/22